

EXHIBIT G

Meisinger, Jeremy

From: Marx, Daniel
Sent: Wednesday, February 17, 2016 7:29 PM
To: tbean@verrilldana.com
Cc: Van Lonkhuyzen, John; Meisinger, Jeremy
Subject: RE: Steward v. Southcoast Matter
Attachments: FHBOSTON-#4514260-v1-Steward -- Plead -- Proposed Discovery Plan DNM Comments 2.17.16.DOCX

Tom,

Without prejudice to Steward's rights to oppose any discovery while Southcoast's motion to dismiss is pending, or Steward's rights to make further changes to any proposed discovery plan that the parties might jointly submit, please find attached a marked up copy of the document that you sent for review. While we are still talking with Steward and considering our position on discovery in general, we thought that it might make the call tomorrow more productive if we identified in advance certain specific issues for discussion.

Regards,
Dan

Daniel N. Marx | Partner

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155 Seaport Boulevard
Boston, Massachusetts 02210-2600

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From: Bean, Thomas [mailto:tbean@verrilldana.com]
Sent: Wednesday, February 17, 2016 11:40 AM
To: Marx, Daniel
Cc: Van Lonkhuyzen, John; Meisinger, Jeremy
Subject: RE: Steward v. Southcoast Matter

Ok. Please call me at 10:30.

Thomas O. Bean

One Boston Place
Suite 1600
Boston, MA 02108
Office: (617) 309-2606
Bio: verrilldana.com/tbean

Verrill Dana
Attorneys at Law

From: Marx, Daniel [<mailto:DMarx@foleyhoag.com>]
Sent: Wednesday, February 17, 2016 10:33 AM
To: Bean, Thomas
Cc: Van Lonkhuyzen, John; Meisinger, Jeremy
Subject: RE: Steward v. Southcoast Matter

Tom, How about 10:30 tomorrow morning? Thanks, Dan

From: Bean, Thomas [<mailto:tbean@verrilldana.com>]
Sent: Wednesday, February 17, 2016 8:55 AM
To: Marx, Daniel
Cc: Van Lonkhuyzen, John; Meisinger, Jeremy
Subject: RE: Steward v. Southcoast Matter

How does 9:30 Thursday morning sound? If that works, do you want to call me?

Thomas O. Bean

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Bio: verrilldana.com/tbean



From: Marx, Daniel [<mailto:DMarx@foleyhoag.com>]
Sent: Tuesday, February 16, 2016 10:15 PM
To: Bean, Thomas
Cc: Van Lonkhuyzen, John; Meisinger, Jeremy
Subject: Re: Steward v. Southcoast Matter

Tom and Jon, I am just back in town this evening. Jeremy and I plan to talk with Steward tomorrow. Could we then talk on Thursday morning? Dan

On Feb 16, 2016, at 10:54 AM, Bean, Thomas <tbean@verrilldana.com<<mailto:tbean@verrilldana.com>>> wrote:

Dan and Jeremy, might you be available for a call at 11:30 tomorrow to discuss the draft I sent you Friday?

Thanks.

Tom

Thomas O. Bean
One Boston Place
Suite 1600
Boston, MA 02108
Office: (617) 309-2606
Bio: verrilldana.com/tbean<<http://www.verrilldana.com/tbean>>
<image001.jpg>

From: Marx, Daniel [<mailto:DMarx@foleyhoag.com>]
Sent: Friday, February 12, 2016 4:17 PM
To: Bean, Thomas; Van Lonkhuyzen, John
Cc: Meisinger, Jeremy
Subject: RE: Steward v. Southcoast Matter

Thanks, Tom. I will discuss this draft with Steward and get back to you on scheduling for next week. Have a good weekend. Dan

Daniel N. Marx | Partner

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From: Bean, Thomas [<mailto:tbean@verrilldana.com>]
Sent: Friday, February 12, 2016 3:35 PM
To: Marx, Daniel; Van Lonkhuyzen, John
Cc: Meisinger, Jeremy
Subject: RE: Steward v. Southcoast Matter

Dan and Jeremy, attached FYR is a DRAFT Joint Discovery Plan. My client has not had the opportunity to review it. So, I reserve the right to make changes.

Is there a time next Wednesday when we can discuss?

Thanks. Have a good week-end.

Tom

Thomas O. Bean
One Boston Place
Suite 1600
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Office: (617) 309-2606
Bio: [verrilldana.com/tbean](http://www.verrilldana.com/tbean)<<http://www.verrilldana.com/tbean>>
<image001.jpg>

From: Marx, Daniel [<mailto:DMarx@foleyhoag.com>]
Sent: Thursday, February 11, 2016 1:42 PM
To: Bean, Thomas; Van Lonkhuyzen, John
Cc: Meisinger, Jeremy
Subject: Steward v. Southcoast Matter

Tom and John,

As we discussed yesterday, please find below some proposed language for addressing ESI and privilege issues in a possible discovery plan. My schedule for next week is still a bit uncertain, but I hope to have more clarity by the weekend. For timing purposes, we do not consider our discussion yesterday to have been our 26(f) conference, and on our next call, we can discuss what makes the most sense in terms of how to proceed in this case.

Regards,
Dan

Rule 26(f)(3)(C) Electronically Stored Information

The parties propose that all documents, except for Microsoft Excel, Project and Access files, shall be produced as black and white, Bates-stamped single-page TIFF images with accompanying document-level extracted text for electronically stored information (“ESI”) or optical character recognition (“OCR”) for scanned hard copy. The parties further propose that all Microsoft Excel, Project, and Access files shall be produced in their native formats. If native files are included in a production, a Bates-stamped TIFF placeholder page rather than a full TIFF image should be provided; however, a TIFF image must be provided for every document. The parties also agree that all productions shall be accompanied by an Opticon (.opt) single-page image load/cross reference file.

Rule 26(f)(3)(D) Privilege/Confidentiality Issues

The parties propose that discovery shall proceed in accordance with a separately filed Proposed Protective Order, to be jointly submitted to the Court, which shall include a prohibition on using discovery materials for any purpose other than in this federal litigation and also a claw-back provision for inadvertently produced privileged information.

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